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UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2005 FEB -1 P 2:18

U.S. DISTRICT COURT  
DISTRICT OF MASS

G. DAVID IVERSON  
and ACCESS WITH SUCCESS,  
INC.

Plaintiffs

v.

CITY OF BOSTON,  
MASSACHUSETTS

Defendant

**EXHIBIT A**

CIVIL ACTION NO.: 04-CV-11825NMG

**FIRST INTERROGATORIES OF THE PLAINTIFF,  
G. DAVID IVERSON, TO THE DEFENDANT, CITY OF BOSTON**

The plaintiff, G. David Iverson, hereby propounds interrogatories to be answered by the defendant, City of Boston, within 45 days hereof pursuant to *Fed. R. Civ. P. 33* and *Local Rule 33.1*.

**DEFINITIONS**

(1) *Communication*. The term "communication" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

(2) *Document*. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Fed. R. Civ. P. 34(a). A draft or non-identical copy is a separate document within the meaning of this term.

(3) *Identify* (With Respect to Persons). When referring to a person, "to identify" means to give, to the extent known, the person's full name, present or last known address, and, when referring to a natural person, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

(4) *Identify* (With Respect to Documents). When referring to documents, “to identify” means to give, to the extent known, the

(a) type of document;

(b) general subject matter;

(c) date of the document; and

(d) author(s), addressee(s), and recipient(s).

(5) *Parties*. The terms “plaintiff” and “defendant” as well as a party’s full or abbreviated name or a pronoun referring to a party mean the party and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

(6) *Person*. The term “person” is defined as any natural person or any business, legal, or governmental entity or association.

(7) *Concerning*. The term “concerning” means referring to, describing, evidencing, or constituting.

(8) *State the Basis*. When an interrogatory calls upon a party to “state the basis” of or for a particular claim, assertion, allegation, or contention, the party shall

(a) identify each and every document (and, where pertinent, the section, article, or subparagraph thereof), which forms any part of the source of the party’s information regarding the alleged facts or legal conclusions referred to by the interrogatory;

(b) identify each and every communication which forms any part of the source of the party’s information regarding the alleged facts or legal conclusions referred to by the interrogatory;

(c) state separately the acts or omissions to act on the part of any person (identifying the acts or omissions to act by stating their nature, time, and place and identifying the persons involved) which form any part of the party’s information regarding the alleged facts or legal conclusions referred to in the interrogatory; and

(d) state separately any other fact which forms the basis of the party’s information regarding the alleged facts or conclusions referred to in the interrogatory.


### INTERROGATORIES

1. Kindly identify the person answering these interrogatories on behalf of the defendant by giving your full name, business or professional address, place of employment and job title.
2. Please describe all new construction completed by the defendant on the City of Boston's sidewalks, curb cuts, and rights-of-way, including work done by third parties, since January 26, 1992 by identifying the work done and the commencement and completion dates.
3. Please describe all steps, if any, taken by the City of Boston to provide access to persons with disabilities and comply with Title II of the ADA in connection with all new construction described in response to the preceding interrogatory.
4. Please describe all alterations and/or renovations completed by the defendant on the City of Boston's sidewalks, curb cuts, and rights-of-way, including work done by third parties, since January 26, 1992 by identifying the work done and the commencement and completion dates.
5. Please describe all steps, if any, taken by the City of Boston to provide access to persons with disabilities and comply with Title II of the ADA in connection with all alterations and/or renovations described in response to the preceding interrogatory.
6. Please describe all new construction of buildings and facilities owned or operated by the City of Boston, including work done by third parties, since January 26, 1992 by identifying the work done and the commencement and completion dates.
7. Please describe all steps, if any, taken by the City of Boston to provide access to persons with disabilities and comply with Title II of the ADA in connection with all new construction described in response to the preceding interrogatory.
8. Please describe all material alterations, renovations and remodeling of buildings and facilities owned or operated by the City of Boston, including work done by third parties, since January 26, 1992 by identifying the work done and the commencement and completion dates.
9. Please describe all steps, if any, taken by the City of Boston to provide access to persons with disabilities and comply with Title II of the ADA in connection with all material alterations, renovations and remodeling described in response to the preceding interrogatory.
10. Please identify any and all architect and/or engineer reports, plans and/or studies from January 26, 1992 to date describing modifications needed on the City's streets and sidewalks in order to provide access to persons with disabilities and comply with Title II of the ADA.

11. Please identify any and all architect and/or engineer reports, plans and/or studies from January 26, 1992 to date describing modifications needed on the City's buildings and facilities in order to provide access to persons with disabilities and comply with Title II of the ADA.

Respectfully submitted,  
The Plaintiff, G. David Iverson,

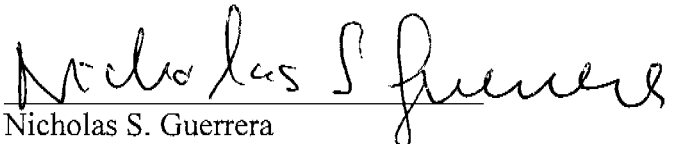
By his Attorneys,

  
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(978)689-0800

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true copy of this pleading on the defendant, through its counsel, by mail on this date pursuant to *Fed. R. Civ. P. 5*.

Dated: 1/31/05

  
Nicholas S. Guerrero